

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERIE DIVISION

ABBY B. CONLEY,

Plaintiff,

vs.

COUNTY OF ERIE, ERIE COUNTY
OFFICE OF CHILDREN AND YOUTH,
a/k/a ERIE COUNTY CHILD WELFARE
SERVICE, RICHARD SCHENKER,
individually and in his capacity as County
Executive of Erie County, Pennsylvania,
PETER CALLAN, individually and in his
capacity as Erie County Director of
Personnel, DEBRA LIEBEL, individually
and in her capacity as Executive Director,
Erie County Office of Children and Youth,
a/k/a Erie County Child Welfare Service
and JOHN A. ONORATO, ESQUIRE,
individually and in his capacity as Erie
County Solicitor,

Defendants

) Docket No. 05-76E
) (SEAN J. MCLAUGHLIN)
)
) ELECTRONICALLY FILED PLEADING
)
) JURY TRIAL DEMANDED
)
) MOTION FOR SUMMARY JUDGMENT OF
) DEFENDANTS THE COUNTY OF ERIE,
) OFFICE OF CHILDREN AND YOUTH, AND
) INDIVIDUAL DEFENDANTS SCHENKER,
) CALLAN AND LIEBEL IN THEIR OFFICIAL
) CAPACITIES
)
) Counsel of record for this party:
)
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**MOTION FOR SUMMARY JUDGMENT OF DEFENDANTS THE COUNTY OF ERIE,
OFFICE OF CHILDREN AND YOUTH, AND INDIVIDUAL DEFENDANTS
SCHENKER, CALLAN AND LIEBEL IN THEIR OFFICIAL CAPACITIES**

Defendants, the County of Erie, Office of Children and Youth, and individual
defendants Richard Schenker, Peter Callan, and Debra Liebel, in their official capacities, through
their counsel, Knox McLaughlin Gornall & Sennett, P.C., hereby move for summary judgment
pursuant to Fed.R.Civ.Pro. 56(e). In support of this motion, the foregoing defendants
incorporate by reference their Concise Statement of Material Facts and Appendix of Exhibits and

the motions for summary judgment and supporting papers filed on behalf of all co-defendants. The County of Erie and the individual defendants in their official capacities respectfully request that the Court enter summary judgment in their favor and against the plaintiff on all claims of the Complaint. No genuine issue of material fact remains for trial and these defendants are entitled to judgment as a matter of law.

RESPECTFULLY SUBMITTED,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

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